

TRO Exhibit 5: Harassment and Coordination

EXHIBIT 5

SWORN STATEMENT REGARDING EMAIL FROM ROBERT HADDAD CALLING PLAINTIFF A
TERROR AND LAWSUIT A SHAM

I, Lester Aubrey Lee, Jr., make the following statement under penalty of perjury pursuant to 28 U.S.C. 1746:

On or about August 9, 2024, Robert Haddad, President of the Brookside Park Condominium Association, sent an email to attorney Anthony D. Dwyer, several board members, and others, referencing my housing situation and this federal lawsuit. In that email, Mr. Haddad referred to me as an 'absolute terror' and characterized my Fair Housing Act lawsuit as a 'sham.' He further stated, 'We need to vigorously defend. And we need to file counterclaims. It seems no one is going to help us unless we push this forward ourselves.'

Critically, this email also documents that attorney Anthony D. Dwyer met with Latresa Hicks, a non-party witness, in the Brookside Park office conference room. This coordination between defense counsel and an unrepresented third-party witness raises serious ethical red flags. As established in *United States v. Clarkson*, 567 F.2d 270 (4th Cir. 1977), an attorney must avoid not only actual conflicts of interest, but the appearance of impropriety that undermines the integrity of judicial proceedings.

Such coordination especially when the subject of litigation is an unrepresented individual tied to retaliatory accusations poses a direct threat to the fairness of this process. I fear that continued behind-the-scenes collaboration of this kind will lead to additional efforts to manufacture evidence or further retaliate against me, now that I am proceeding pro se.

I respectfully submit this sworn statement as Exhibit 5 in support of my Emergency Motion for Temporary Restraining Order and Motion to Disqualify Counsel.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 11, 2025.

A handwritten signature in black ink, consisting of a stylized 'L' followed by a long horizontal line.

Lester Aubrey Lee, Jr.

Plaintiff Pro Se